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Attorneys for: Defendants CAL TEX HOSPITALITY, L.L.C., METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC

**UNITED STATES DISTRICT COURT,
EASTERN DISTRICT OF CALIFORNIA**

JANE DOE, an individual

Plaintiff,

v.

WYNDHAM HOTEL & RESORTS, INC.;
THANDI ENTERPRISES, L.L.C.; CAL
TEX HOSPITALITY, L.L.C; METRO
HOSPITALITY SERVICES, INC.; RED
ROOF INNS, INC.; OCEANIC FRESNO,
L.P.; VAGABOND INN CORPORATION;
BOOTA SINGH CHARIL, as an
individual trustee of CHARIL FAMILY
TRUST; KULDIP KAUR CHARIL, as an
individual trustee of CHARIL FAMILY
TRUST; KANTILAL B. PATEL, as an
individual trustee of PATEL K B & I K
LIVING TRUST; INDIRABEN K.
PATEL, as an individual trustee of
PATEL KB & I K LIVING TRUST;
MADHUBEN K. PATEL, an individual;
JAGRATI D. BHAKTA, an individual;
ROGER BHAKTA, an individual; and
ROES 1-200, inclusive,

Defendants.

Case No. 1:25-CV-00026-JLT-BAM

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADING**

Complaint Filed:
Trial Date:

January 8, 2025
None Set

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1 Plaintiff JANE DOE ("Plaintiff") and Defendants CAL TEX HOSPITALITY, L.L.C.,
2 METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC (collectively,
3 "Defendants"), by and through their respective counsel, hereby stipulate and agree as follows:

4 1. METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC
5 were served with the summons and complaint in this matter 5. METRO HOSPITALITY
6 SERVICES, INC. has not yet been served. At this time, the aforementioned three (3) Defendants
7 have elected to be represented by the same counsel and seek to have a singular date to respond that
8 will enable the parties to streamline the process and avoid duplication and waste while Defense
9 counsel has represented that counsel is concurrently exploring settlement authority and coverage
10 issues.

11 2. The parties agree that there is good cause to extend Defendants' time to respond
12 to the complaint to February 28, 2025, to allow sufficient time for Defendants to prepare their
13 response and confirm the availability of insurance coverage.

14 3. The requested extension will not unduly delay these proceedings and is made
15 in the interest of judicial efficiency.

16 Accordingly, the parties stipulate and respectfully request that the Court enter an order
17 permitting Defendants CAL TEX HOSPITALITY, L.L.C., METRO HOSPITALITY SERVICES,
18 INC., and THANDI ENTERPRISES LLC to file a responsive pleading on or before February 28,
19 2025.

20 **IT IS SO STIPULATED.**

21 Dated: February 18, 2025

SINGLETON SCHREIBER, LLP

22 /s/ Meagan Verschueren

23 By Meagan Verschueren

24 Attorneys for Plaintiff JANE DOE

25 Dated: February 18, 2025

26 WHELAN LAW GROUP,
27 A Professional Corporation

28 /s/ Brian D. Whelan

By Brian D. Whelan,

Attorneys for Defendants CAL TEX HOSPITALITY,
L.L.C., METRO HOSPITALITY SERVICES, INC.,
and THANDI ENTERPRISES LLC

ORDER

Having reviewed the stipulation submitted by the parties, and for good cause shown, IT IS
HEREBY ORDERED:

1. Defendants CAL TEX HOSPITALITY, L.L.C., METRO HOSPITALITY
SERVICES, INC., and THANDI ENTERPRISES LLC shall file their responsive pleading(s) on or
before February 28, 2025.

IT IS SO ORDERED.

Dated: February 18, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE